

## Exhibit I

**Subject:** Re: Reeser

**From:** Keith Flynn [mailto:kflynn@millercohen.com]  
**Sent:** Thursday, February 12, 2015 1:43 PM  
**To:** Miglio, Terrence J.  
**Cc:** Ada Verloren  
**Subject:** RE: Reeser

Terrence:

- (1) Plaintiff provided you with signed authorizations for the medical records requested in Defendant's Interrogatories and Requests to Produce. They are attached to your email.
- (2) Plaintiff provided answers addressing all of those sub-parts for Interrogatories 4a, b, and c and 5a, b, and c. Look at our responses. It does not seem like you read them.
- (3) Plaintiff did not indicate that she would attempt to prevent you from receiving documents from her current employer. In fact, she provided you with an authorization with a blank space for any of her employers back in July. You acted on that authorization and subpoenaed those employers' files. You then provided Plaintiff with a copy of those documents at Plaintiff's expense. Have you not reviewed your own file or are you getting this case mixed up with another?

File your motion and I will be forced to seek sanctions for your frivolity. Your discovery issues could be resolved by opening up a filing cabinet at your office. Or, as you demonstrated, partially resolved by looking at the documents that you attached to your last email.

As for the depositions, Plaintiff will not be held hostage to your imaginary discovery disputes. I reiterate that I am trying to cooperate, but you are leaving me no choice. At minimum, provide me with notice that you intend to follow up with your client regarding dates of availability and will do your best to provide those dates to me by the end of next week. Without such an assurance by the end of business tomorrow, I will be forced to unilaterally schedule those depositions and serve subpoenas.

Please advise.

- Keith

**From:** Miglio, Terrence J. [mailto:tjmiglio@varnumlaw.com]  
**Sent:** Thursday, February 12, 2015 1:02 PM  
**To:** Keith Flynn  
**Subject:** RE: Reeser

- 1) Just so you are clear on the issue of the authorizations, I am sending you what I requested and what you provided. HFHS requires a specific form authorization which is attached.
- 2) As to the interrogatories, 4a,b and c has not been answered as to all of the employers identified. 5a,b and c have not been answered as to all of the employers identified. No authorizations were provided for the employers.
- 3) You have no basis to prevent Defendant from obtaining records from Plaintiff's current employer which are clearly relevant and discoverable. Your "retaliatory" objection is ridiculous and sanctionable. If you want to propose how you and or your client can provide me with the

records in an alternative method please advise. Otherwise I will obtain them through the issuance of a subpoena.

If I don't get answers and authorizations by next Tuesday I will file a motion.

**Terrence J. Miglio, Esq.**

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**From:** Keith Flynn [<mailto:kflynn@millercohen.com>]

**Sent:** Thursday, February 12, 2015 11:40 AM

**To:** Miglio, Terrence J.

**Subject:** RE: Reeser

First, you have not identified a single subpart that Plaintiff has not answered regarding Interrogatories 4 and 5. Did you even read our supplemental responses?

Second, no you did not. You offered one date apiece for two witnesses. Plaintiff requested availability for three witnesses and indicated that we were free the second and third weeks of February. You got me dates for the first week when I was unavailable. All I have heard is crickets from you since that time regarding depositions. Enough time has gone by to coordinate—over two months since my initial request.

Now that Plaintiff has employment and lives up north, her availability is no longer as free as it was over a month ago. Provide me with some dates to run past her and we will figure out a date for her deposition.

Third, we have turned over all authorizations that were formally requested by your Interrogatories and Requests to Produce with the exception of a job Plaintiff just started a couple of weeks ago. You are making up discovery issues to stall my depositions.

Please advise as to dates that your witnesses are available. Here are some proposed dates based on my schedule: February 18-28, March 2-13.

Please advise.

- Keith

**From:** Miglio, Terrence J. [mailto:tjmiglio@varnumlaw.com]  
**Sent:** Thursday, February 12, 2015 11:10 AM  
**To:** Keith Flynn  
**Subject:** RE: Reeser

First, you haven't answered Interrogatories 4 and 5, they each have subparts which after making ridiculous objections to, you still haven't answered.  
Second, I offered you dep dates for the witnesses you wanted, you told me you couldn't do those dates and to offer you more, I had to contact those deponents again and coordinate dates. You haven't offered any dates. Where are the dep dates for your client?  
Where are the authorizations for your client's medical and psych records from HFHS that we have been asking for since October?

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**From:** Keith Flynn [mailto:kflynn@millercohen.com]  
**Sent:** Thursday, February 12, 2015 11:01 AM  
**To:** Miglio, Terrence J.  
**Subject:** RE: Reeser

What additional information are suggesting is missing regarding Plaintiff's new employment? All applicable authorizations have been turned over to you with the exception of her new employment, which she just started a couple of weeks ago.

Where are my dates for deposing witnesses? I have been asking for months. You provided two take-it-or-leave-it dates, weeks after my request, that Plaintiff informed you were unavailable and now you have been mum ever since. You haven't even provided one date for the other remaining witness identified by Plaintiff.

I would like to cooperate with you and pick dates that are convenient for everyone, but without additional dates for each witness—not just one date for each take-it-or-leave-it style—these depositions will never be scheduled without unilateral action from Plaintiff.

Please advise as soon as possible. If I do not hear anything from you by the close of business tomorrow, I will simply unilaterally schedule the depositions.

- Keith

**From:** Miglio, Terrence J. [mailto:tjmiglio@varnumlaw.com]  
**Sent:** Thursday, February 12, 2015 10:47 AM  
**To:** Keith Flynn  
**Subject:** RE: Reeser

You still haven't completely answered interrogatory no.s 4 and 5 and have not produced the authorizations.

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**From:** Keith Flynn [mailto:kflynn@millercohen.com]  
**Sent:** Wednesday, February 11, 2015 9:27 AM  
**To:** Miglio, Terrence J.  
**Subject:** RE: Reeser

Mr. Miglio:

What recent interrogatories are you referring to? To my knowledge, my office has only received one set of interrogatories from Defendant. We sent you supplemental responses to your interrogatories last week.

I still have not heard back from you regarding the availability of Defendant's witnesses. I request availability as a courtesy. However, if you refuse to provide dates of availability, then Plaintiff will be forced to move forward with discovery accordingly. Please provide dates of availability for the witnesses that Plaintiff has requested to depose. If I do

not hear back from you by the end of the week, then I will unilaterally notice those depositions for a time most convenient for Plaintiff.

Please advise.

Thanks.

- Keith

**From:** Miglio, Terrence J. [mailto:tjmiglio@varnumlaw.com]  
**Sent:** Tuesday, February 10, 2015 2:38 PM  
**To:** Keith Flynn  
**Cc:** Buchanan, Barbara E.  
**Subject:** Reeser

Mr. Flynn,

We have still not received from your client, signed authorizations to obtain her medical and psychological records from Henry Ford Health System. We have been asking for these authorizations since October 2014. In addition these most recent interrogatories have not been answered. Please advise as to whether we can expect the authorizations and whether you will be supplementing the interrogatory answers.

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